Section 1. Registration Information

Source Identification

Facility Name:	Taylor Farms Retail, Inc.
Parent Company #1 Name:	Taylor Farms Fresh Foods, Inc.
Parent Company #2 Name:	

Submission and Acceptance

Submission Type:	Re-submission
Subsequent RMP Submission Reason:	Voluntary update (not described by any of the above reasons)
Description:	
Receipt Date:	03-Aug-2010
Postmark Date:	03-Aug-2010
Next Due Date:	03-Aug-2015
Completeness Check Date:	03-Aug-2010
Complete RMP:	Yes
De-Registration / Closed Reason:	
De-Registration / Closed Reason Other Text:	
De-Registered / Closed Date:	
De-Registered / Closed Effective Date:	
Certification Received:	Yes

Facility Identification

EPA Facility Identifier:	1000 0018 8637
Other EPA Systems Facility ID:	

Dun and Bradstreet Numbers (DUNS)

Facility DUNS:	840735687
Parent Company #1 DUNS:	
Parent Company #2 DUNS:	

Facility Location Address

Street 1:	100 Puente Del Monte Avenue
Street 2:	
City:	Gonzales
State:	CALIFORNIA
ZIP:	93926
ZIP4:	
County:	MONTEREY

Facility Latitude and Longitude

Latitude (decimal):	36.501389
Longitude (decimal):	-121.446944
Lat/Long Method:	Interpolation - Photo
Lat/Long Description:	Center of Facility
Horizontal Accuracy Measure:	25
Horizontal Reference Datum Name:	North American Datum of 1983
Source Map Scale Number:	24000

Owner or Operator

Operator Name:	Taylor Farms Retail, Inc.
Operator Phone:	(831) 675-1370

Mailing Address

Operator Street 1:	100 Puente Del Monte Avenue
Operator Street 2:	
Operator City:	Gonzales
Operator State:	CALIFORNIA
Operator ZIP:	93926
Operator ZIP4:	
Operator Foreign State or Province:	
Operator Foreign ZIP:	
Operator Foreign Country:	

Name and title of person or position responsible for Part 68 (RMP) Implementation

RMP Name of Person:	Nicholas DaCosta
RMP Title of Person or Position:	Chief Operating Officer
RMP E-mail Address:	ndacosta@taylorfarms.com

Emergency Contact

Emergency Contact Name:	Carlos Ballesteros
Emergency Contact Title:	Cooler Supervisor
Emergency Contact Phone:	(831) 675-1370
Emergency Contact 24-Hour Phone:	(831) 424-1111
Emergency Contact Ext. or PIN:	d=Alarm Co
Emergency Contact E-mail Address:	cballesteros@taylorfarms.com

Other Points of Contact

Facility or Parent Company E-mail Address:	
Facility Public Contact Phone:	
Facility or Parent Company WWW Homepage Address:	

Local Emergency Planning Committee

LEPC:	Region II LEPC

Full Time Equivalent Employees

Number of Full Time Employees (FTE) on Site:	200
FTE Claimed as CBI:	

Covered By

OSHA PSM :	Yes
EPCRA 302 :	Yes
CAA Title V:	

Air Operating Permit ID:

OSHA Ranking

OSHA Star or Merit Ranking:

Last Safety Inspection

Last Safety Inspection (By an External Agency) Date:	26-Jul-2010
Last Safety Inspection Performed By an External Agency:	Monterey County - CUPA

Predictive Filing

Did this RMP involve predictive filing?:

Preparer Information

Preparer Name:	Kim Snowden -Snowden Engineering
Preparer Phone:	(831) 455-9011
Preparer Street 1:	19495 Redding Drive
Preparer Street 2:	
Preparer City:	Salinas
Preparer State:	CALIFORNIA
Preparer ZIP:	93908
Preparer ZIP4:	
Preparer Foreign State:	
Preparer Foreign Country:	
Preparer Foreign ZIP:	

Confidential Business Information (CBI)

CBI Claimed:
Substantiation Provided:
Unsanitized RMP Provided:

Reportable Accidents

Reportable Accidents: See Section 6. Accident History below to determine if there were any accidents reported for this RMP.

Process Chemicals

Process ID:	1000018904
Description:	Ammonia Refrigeration
Process Chemical ID:	1000022488
Program Level:	Program Level 3 process
Chemical Name:	Ammonia (anhydrous)
CAS Number:	7664-41-7
Quantity (lbs):	21000
CBI Claimed:	
Flammable/Toxic:	Toxic

Process NAICS

Process ID:	1000018904
Process NAICS ID:	1000019246
Program Level:	Program Level 3 process
NAICS Code:	49312
NAICS Description:	Refrigerated Warehousing and Storage

Process ID:	1000018904
Process NAICS ID:	1000019247
Program Level:	Program Level 3 process
NAICS Code:	311991
NAICS Description:	Perishable Prepared Food Manufacturing

Section 2. Toxics: Worst Case

Toxic Worst ID: 1000014995

Percent Weight:	
Physical State:	Gas liquified by pressure
Model Used:	EPA's RMP*Comp Version 1.07
Release Duration (mins):	10
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	F
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Section 3. Toxics: Alternative Release

Toxic Alter ID: 1000016504

Percent Weight:	
Physical State:	Gas liquified by refrigeration
Model Used:	Areal Locations of Hazardous Atmospheres [ALOHA(R)]
Wind Speed (m/sec):	1.5
Atmospheric Stability Class:	B
Topography:	Rural

Passive Mitigation Considered

Dikes:	
Enclosures:	
Berms:	
Drains:	
Sumps:	
Other Type:	

Active Mitigation Considered

Sprinkler System:	
Deluge System:	
Water Curtain:	
Neutralization:	
Excess Flow Valve:	
Flares:	
Scrubbers:	
Emergency Shutdown:	
Other Type:	

Section 4. Flammables: Worst Case

No records found.

Section 5. Flammables: Alternative Release

No records found.

Section 6. Accident History

No records found.

Section 7. Program Level 3

Description

The ammonia process is a mechaincal refrigeration system, which consists of equipment located outside and inside the Refrigeration Engine Area and Refrigerated Areas.The Preventation Program applies to the system as a whole.

Program Level 3 Prevention Program Chemicals

Prevention Program Chemical ID:	1000018660
Chemical Name:	Ammonia (anhydrous)
Flammable/Toxic:	Toxic
CAS Number:	7664-41-7
Prevention Program Level 3 ID:	1000015596
NAICS Code:	49312

Safety Information

Safety Review Date (The date on which the safety information was last reviewed or revised):	01-Jul-2010

Process Hazard Analysis (PHA)

PHA Completion Date (Date of last PHA or PHA update):	02-Jul-2010

The Technique Used

What If:	
Checklist:	
What If/Checklist:	Yes
HAZOP:	
Failure Mode and Effects Analysis:	
Fault Tree Analysis:	
Other Technique Used:	
PHA Change Completion Date (The expected or actual date of completion of all changes resulting from last PHA or PHA update):	30-Jun-2011

Major Hazards Identified

Toxic Release:	Yes
Fire:	Yes
Explosion:	
Runaway Reaction:	
Polymerization:	
Overpressurization:	Yes
Corrosion:	Yes
Overfilling:	Yes
Contamination:	Yes
Equipment Failure:	Yes
Loss of Cooling, Heating, Electricity, Instrument Air:	Yes
Earthquake:	Yes

Floods (Flood Plain):	Yes
Tornado:	
Hurricanes:	
Other Major Hazard Identified:	

Process Controls in Use

Vents:	
Relief Valves:	Yes
Check Valves:	Yes
Scrubbers:	
Flares:	
Manual Shutoffs:	Yes
Automatic Shutoffs:	Yes
Interlocks:	Yes
Alarms and Procedures:	Yes
Keyed Bypass:	
Emergency Air Supply:	
Emergency Power:	
Backup Pump:	
Grounding Equipment:	Yes
Inhibitor Addition:	
Rupture Disks:	
Excess Flow Device:	
Quench System:	
Purge System:	
None:	
Other Process Control in Use:	

Mitigation Systems in Use

Sprinkler System:	
Dikes:	Yes
Fire Walls:	
Blast Walls:	
Deluge System:	
Water Curtain:	
Enclosure:	
Neutralization:	
None:	
Other Mitigation System in Use:	Ammnonia Diffusion Tank

Monitoring/Detection Systems in Use

Process Area Detectors:	Yes
Perimeter Monitors:	
None:	
Other Monitoring/Detection System in Use:	

Changes Since Last PHA Update

Reduction in Chemical Inventory:	
Increase in Chemical Inventory:	
Change Process Parameters:	
Installation of Process Controls:	

Installation of Process Detection Systems:	
Installation of Perimeter Monitoring Systems:	
Installation of Mitigation Systems:	
None Recommended:	
None:	
Other Changes Since Last PHA or PHA Update:	Change of owner / operator

Review of Operating Procedures

Operating Procedures Revision Date (The date of the most recent review or revision of operating procedures):	06-Jul-2010

Training

Training Revision Date (The date of the most recent review or revision of training programs):	01-Jul-2010

The Type of Training Provided

Classroom:	
On the Job:	Yes
Other Training:	

The Type of Competency Testing Used

Written Tests:	
Oral Tests:	
Demonstration:	Yes
Observation:	Yes
Other Type of Competency Testing Used:	

Maintenance

Maintenance Procedures Revision Date (The date of the most recent review or revision of maintenance procedures):	01-Jul-2010
Equipment Inspection Date (The date of the most recent equipment inspection or test):	06-Jul-2010
Equipment Tested (Equipment most recently inspected or tested):	Service Tech inspection of refrigeration equipment per IIAR 109

Management of Change

Change Management Date (The date of the most recent change that triggered management of change procedures):	01-Jul-2010
Change Management Revision Date (The date of the most recent review or revision of management of change procedures):	01-Jul-2010

Pre-Startup Review

Pre-Startup Review Date (The date of the most recent pre-startup review):	29-Jun-2010

Compliance Audits

Compliance Audit Date (The date of the most recent compliance audit):	29-Jul-2010
Compliance Audit Change Completion Date (Expected or actual date of completion of all changes resulting from the compliance audit):	30-Jun-2011

Incident Investigation

Incident Investigation Date (The date of the most recent incident investigation (if any)):	
Incident Investigation Change Date (The expected or actual date of completion of all changes resulting from the investigation):	

Employee Participation Plans

Participation Plan Revision Date (The date of the most recent review or revision of employee participation plans):	01-Jul-2010

Hot Work Permit Procedures

Hot Work permit Review Date (The date of the most recent review or revision of hot work permit procedures):	01-Jul-2010

Contractor Safety Procedures

Contractor Safety Procedures Review Date (The date of the most recent review or revision of contractor safety procedures):	01-Jul-2010
Contractor Safety Performance Evaluation Date (The date of the most recent review or revision of contractor safety performance):	06-Jul-2010

Confidential Business Information

CBI Claimed:	

Section 8. Program Level 2

Section 9. Emergency Response

Written Emergency Response (ER) Plan

Community Plan (Is facility included in written community emergency response plan?):	Yes
Facility Plan (Does facility have its own written emergency response plan?):	Yes
Response Actions (Does ER plan include specific actions to be taken in response to accidental releases of regulated substance(s)?):	Yes
Public Information (Does ER plan include procedures for informing the public and local agencies responding to accidental release?):	Yes
Healthcare (Does facility's ER plan include information on emergency health care?):	Yes

Emergency Response Review

Review Date (Date of most recent review or update of facility's ER plan):	30-Aug-2009

Emergency Response Training

Training Date (Date of most recent review or update of facility's employees):	10-Jul-2010

Local Agency

Agency Name (Name of local agency with which the facility ER plan or response activities are coordinated):	Monterery County Health Department
Agency Phone Number (Phone number of local agency with which the facility ER plan or response activities are coordinated):	(831) 755-4511

Subject to

OSHA Regulations at 29 CFR 1910.38:	Yes
OSHA Regulations at 29 CFR 1910.120:	Yes
Clean Water Regulations at 40 CFR 112:	
RCRA Regulations at CFR 264, 265, and 279.52:	
OPA 90 Regulations at 40 CFR 112, 33 CFR 154, 49 CFR 194, or 30 CFR 254:	
State EPCRA Rules or Laws:	Yes
Other (Specify):	OSHA 1910.120(q) First Responder Training; Calif. Chapter 6.95 Article 1 Section 25500

Executive Summary

SCOPE

The EPA RMP and CalARP RMP regulations requires that an Executive Summary be provided as part of the registration submitted to the EPA and to the CalARP CUPA. The following areas are addressed in this summary:

Â¿Accidental Release Prevention and Emergency Response Policies
Â¿Stationary Source Activities and Regulated Substances Handled
Â¿Worst-Case and Alternative-Case Release Scenarios
Â¿Prevention Program
Â¿Five-Year Accident History
Â¿Emergency Response Program
Â¿Planned Changes to Improve Safety

ACCIDENTAL RELEASE PREVENTION AND EMERGENCY RESPONSE POLICIES

Taylor Farms is committed to complying with all of the regulatory requirements of the EPA Risk Management Program and the California Accidental Release Prevention Program. Taylor Farms has developed their Risk Management Plan / Process Safety Management (RMP/PSM) Manual to document Taylor Farms policies addressing the implementation of these regulations. The PSM sections pertain to the prevention of accidental releases and include the Process Hazard Analysis study and procedures for operating, training, maintenance and others. The RMP sections pertain to management systems and emergency response and include the Hazard Assessment (Offsite Consequence Analysis) Report.

STATIONARY SOURCE ACTIVITIES AND REGULATED SUBSTANCES HANDLED

The Taylor Farms Gonzales facility provides product cooling, processing and short-term storage for fresh vegetables. This processing includes cooling, cleaning, cutting and packaging vegetables.

The facility is located in a rural/industrial area of Gonzales. Ammonia is used as the refrigerant in the Main Refrigeration System ("System"). This is a direct, mechanical refrigeration system, which was built and started up in 2004 by the previous owner/operator (specifically - Foxy Foods, LLC). The ammonia equipment is located inside and outside.

WORST-CASE SCENARIO ANALYSIS

HAZARD ASSESSMENT

The regulation requires that the Worst-Case Release Scenario use the ammonia quantity in the largest vessel or pipe.

NOTE: It is important to consider that the Worst-Case Scenario is extremely unlikely to occur since this scenario does not consider any safety features of the system - in either design or operation. The scenario parameters are established by the regulation to provide uniformity for dialog between the industry, community, and regulatory agencies.

The regulation allows the facility to select the Alternate-Case Scenario.

PREVENTION PROGRAM

Taylor FarmsÂ¿ Prevention Program is described in the RMP/PSM Manual. The RMP Prevention Program is equivalent to OSHA's Process Safety Management Program (PSM). The Prevention Program implemented by Taylor Farms is essential to help prevent releases and to minimize the effects if a release does occur.
Key objectives of Taylor Farms Prevention Program are briefly described below:

1.Maintain current and complete refrigeration system technical information. (Addressed under the Process Safety Information chapter)
2.Thorough team evaluation of the refrigeration system. The evaluation considers a number of potential problems including: mechanical problems, human errors, and external events (e.g., earthquakes). All safety recommendations developed by the team are reviewed and addressed by Taylor Farms. (Addressed under Process Hazard Analysis chapter.)
3.Written procedures and policies that establish how the refrigeration system should be operated and maintained and how to investigate accidental releases. (Addressed under Operating Procedures, Mechanical Integrity, and Incident Investigation chapters.)

4.Certification of refrigeration operators to safely operate the refrigeration system. Taylor Farms certifies operators following completion of operator training and Taylor FarmsÂ¿ confirmation of the operator's ability apply what they have learned. (Addressed under Training chapter.)
5.Employee involvement in the Prevention Program. This is addressed on two levels. First, refrigeration equipment operators participate in the planning and evaluation of the Prevention Programs (e.g., Process Hazard Analysis study team, writing and/or reviewing operating procedures, Incident Investigation team, etc.). This involvement encourages ownership of the Prevention Program and positively affects the operators' day-to-day activities.
Second, all Taylor Farms employees (direct hires and contract) at this facility receive ammonia awareness training. Additionally, they have access to the RMP/PSM information. These activities improve the overall safety of the employees. (Both levels are addressed under Employee Participation chapter)
6. Implementation of additional measures when changes are planned (procedural or mechanical). These measures begin before any changes are made and may include a Process Hazard Analysis, operator training, and Process Safety Information updates plus other measures required by Taylor FarmsÂ¿ Management of Change Procedure.
If a mechanical change is required and for maintenance contracts, Taylor Farms has a procedure for selecting a contractor based on the company's experience and safety history. Additionally, if welding, grinding, or other "Hot Work" occurs close to the refrigeration system, a Taylor Farms Hot Work permit is required. The purpose of the permit and the associated Hot Work procedure is to minimize the possible of a fire.
Following completion of a mechanical change, a pre-startup safety review is required before the system can be started. (These areas are addressed under Management of Change, Contractor Qualifications, Hot Work Permit, and Pre-Start-up Safety Review chapters.)
7.Verification of Taylor FarmsÂ¿ compliance with the RMP/PSM program. This self-audit process is an important tool to confirm whether each of the elements in the Prevention Program (and the Risk Management Program) has been implemented and properly documented by Taylor Farms personnel. Taylor Farms has established a Management System procedure to address any shortcomings, which the audit may find. (Addressed under Compliance Audit chapter.)
8.Minimize employee injury and illness. (Addressed under Taylor FarmsÂ¿ Illness and Injury Prevention Program.)

FIVE-YEAR ACCIDENT HISTORY
The Taylor Farms facility has no reportable accidental ammonia releases in the last five years.

EMERGENCY RESPONSE PROGRAM
Taylor FarmsÂ¿ Emergency Response Program is described in their Emergency Response Plan for the Gonzales facility.

This plan includes procedures for evacuations, notifying responders and governmental agencies. The plan also includes first aid procedures for immediate care and instructions for follow-up medical care when necessary. The plan addresses training requirements for employees including production employees, supervisors, managers, and operators. Evacuation drills are an important part of the training.
Under Taylor FarmsÂ¿ Emergency Response policy, Taylor Farms employees who have been trained as "First Responders" may initially respond to releases that can be addressed without entering the danger area (i.e. de-energizing equipment). Taylor Farms will evacuate affected area, begin notification process and rely on off-site responders (e.g., the fire department and/or refrigeration contractor).

PLANNED CHANGES TO IMPROVE SAFETY
The Process Hazard Analysis (PHA) study team developed recommendations to improve safety and to reduce the possibility of a release.
Key recommendations identified during study included;

Â¿ Improve roof access and add a second access
Â¿ Define written PM Schedule, including Â¿failÂ¿ test of safety components.
Â¿ Establish additional written procedures, including safe work practices and maintenance procedures
Â¿ Request review and letter from project Structural Engineers to confirm seismic design of building and ammonia equipment supports/anchorage for the planned CH10 (under MCF-01-10)

Â¿ Consider forklift guard/ protection at Raw Product Room evaporators
Â¿ Install Oil Return line at Hydrocooler to allow oil draining via an oil pot (OP-01)
Â¿ Develop confine space policy and confirm all confined spaces are posted as such
Â¿ Revise piping design at RPP to eliminate deadheading

Implementation of the measures has begun according to the schedule set by Taylor Farms.